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Patrick Morris
Central Valley Regional Board
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Mr. Morris and Staff,

Southeast Asian Assistance Center (SAAC) would like to submit these comments on the proposed Delta Methylmercury TMDL, released in February 2008. For the past 2 years, SAAC, in collaboration with UC Davis, has been conducting outreach and information to subsistence fishers in our communities of service: newcomers from Southeast Asia and the former Soviet Union, now residing in the Sacramento area. We have also conducted surveys about fish consumption, both frequency and preferred varieties. From this data, UC Davis has been able to track patterns of fish consumption that demonstrate a much higher level of consumption than just one meal per week. Some people fish every day. Fish is a high value food in many cultures, and low income people need to supplement their diets by fishing, especially now that food prices are rising. We are concerned that the strategy being considered is mainly based on consumers monitoring their own fishing behavior, rather than providing a cleaner environment where the public will be able to fish safely.

At the community meetings, people express support for actual source cleanup and remediation measures, some of which are recommended in the TMDL report. However, given that people are, and have been, consuming fish in significant amounts, we are concerned that the report does not require reductions before another 8-year study period. Studies have already been conducted and the health effects of mercury are documented. We support an adaptive management approach that would combine reduction actions with further study, and public reporting of these actions and their results.

Community based organizations are mediators between the people we serve and the wider community, including government agencies. We recommend that communities impacted by mercury contamination of fish be included in decisions which affect their health. CBOs such as ours can help to coordinate efforts to educate the communities we serve, and bring their voices to the discussion about what actions should be taken to remove toxins such as mercury from the public waterways.

Thank you for the opportunity to address this important health concern.

Sincerely,

Laura Leonelli, Executive Director